UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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ATTORNEYS FOR DEFENDANT

DEVORAH LUNGER, on behalf of herself and all other similarly situated persons,

Plaintiff,

Civil Action No. 11 Civ. 7552 (DLC)

v.

UNION OF ORTHODOX JEWISH CONGREGATIONS OF AMERICA (ORTHODOX UNION),

Defendant.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Defendant's Memorandum of Law in Support of its Motion to Dismiss Plaintiff's Complaint, Defendant Union of Orthodox Jewish Congregations of America (hereinafter referred to as the "OU" or "Defendant"), by and through its undersigned attorneys, Jackson Lewis LLP, will move this Court before the Honorable Denise L. Cote at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order pursuant to Rule 12 of the Federal Rules of Civil Procedure dismissing Plaintiff's claims in their entirety.

Respectfully submitted,

JACKSON LEWIS LLP 666 Third Avenue, 29th Floor New York, New York 10017 (212) 545-4000

Date: January 10, 2012 New York, New York By:

Clifford R. Atlas Felice B. Ekelman Daniel D. Schudroff

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2012, a true and correct copy of the foregoing Notice of Motion was served, via ECF upon Plaintiff Devorah Lunger's counsel of record, Arnold Pedowitz, Esq., at the following address:

Arnold Henry Pedowitz

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